

1 KARINEH KHACHATOURIAN (SBN 202634)

Email: karineh.khachatourian@bipc.com

2 BRYAN J. SINCLAIR (SBN 205885)

Email: bryan.sinclair@bipc.com

3 JEFFREY M. RATINOFF (SBN 197241)

Email: jeffrey.ratinoff@bipc.com

4 BUCHANAN INGERSOLL & ROONEY LLP

333 Twin Dolphin Drive, Suite 700

5 Redwood Shores, California 94065-1418

Telephone: (650) 622-2300

6 Facsimile: (650) 622-2499

7 GEORGE GOTTLIEB (ADMITTED *PRO HAC VICE*)

Email: ggottlieb@grr.com

8 MARC P. MISTHAL (ADMITTED *PRO HAC VICE*)

Email: mmisthal@grr.com

9 GOTTLIEB RACKMAN & REISMAN, P.C.

270 Madison Avenue

10 New York, NY 10016-0601

Telephone: (212) 684-3900

11 Facsimile: (212) 684-3999

12 Attorneys for Plaintiff and Counter-Defendant,  
KNOLL, INC.

14 UNITED STATES DISTRICT COURT

15 NORTHERN DISTRICT OF CALIFORNIA

16 KNOLL, INC., a Delaware corporation,

17 Plaintiff,

18 vs.

19 DANRICK COMMERCE GROUP, LLC a/k/a  
20 MODERNCOLLECTIONS.COM, DANNY  
LOUIE, and DOES A-Z, Retailers for  
Alphaville Design, Inc.,

21 Defendants.

23 AND RELATED COUNTERCLAIMS.

24 [Caption continued on following page.]

Related Case No. 08-CV-0778-MHP

**STIPULATION EXTENDING TIME FOR  
KNOLL, INC. TO RESPOND TO  
DANRICK COMMERCE GROUP, LLC'S  
COUNTERCLAIMS**

Judge: Honorable Marilyn H. Patel

Complaint filed: February 1, 2008  
Trial Date: None set

1 ALPHAVILLE DESIGN, INC., a Delaware  
corporation,

2 Plaintiff,

3 vs.

4 KNOLL, INC., a Delaware corporation,

5 Defendant.

6  
7  
8 AND RELATED COUNTERCLAIMS.

Related Case No. 07-CV-05569 MHP

**STIPULATION EXTENDING TIME FOR  
KNOLL, INC. TO RESPOND TO  
DANRICK COMMERCE GROUP, LLC'S  
COUNTERCLAIMS**

Judge: Honorable Marilyn H. Patel

Complaint filed: November 1, 2007

Trial Date: None set

**STIPULATION**

WHEREAS, on February 1, 2008, Plaintiff KNOLL, INC. ("Knoll") filed suit for trademark infringement, unfair competition and related claims against, Defendants DANRICK COMMERCE GROUP, LLC a/k/a MODERNCOLLECTIONS.COM ("Danrick "), and DANNY LOUIE ("Louie").

WHEREAS, after obtaining a 15-day stipulated extension of time to respond to the Complaint, on March 12, 2008, Danrick and Louie (collectively "Defendants") filed their Answer to Knoll's Complaint and Danrick filed its Counterclaims against Knoll.

WHEREAS, Knoll's response to the Counterclaims is currently due on April 1, 2008.

WHEREAS, in light of the challenge to the validity of the Knoll trademarks asserted by the plaintiff in another related Action, entitled *Alphaville Design, Inc., vs. Knoll, Inc.*, Case No. 07-CV-05569 MHP, the parties are negotiating a stipulation and proposed order to stay this Action.

WHEREAS, Knoll and Danrick agree that the time for Knoll to respond to the Counterclaims should be continued to help facilitate these negotiations and is in the interests of judicial economy and conserving the resources of the parties.

WHEREAS, this is the first extension sought in relation to the Counterclaims, this extension is not for the purpose of delay, and the parties believe that this extension of time will not affect any dates that have been set by the Court.

ACCORDINGLY, the parties, by and through their undersigned counsel, HEREBY STIPULATE that Knoll's response to the Counterclaims filed by Danrick, which was originally due on April 1, 2008, may be filed and served up to and including May 1, 2008.

Dated: March 31, 2008

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

/s/ Nathaniel Bruno

By: Neil A. Smith  
Nathaniel Bruno  
Attorneys for Defendants,  
DANRICK COMMERCE GROUP, LLC. a/k/a  
MODERNCOLLECTIONS.COM, and DANNY  
LOUIE

1 Dated: March 31, 2008

BUCHANAN INGERSOLL & ROONEY LLP

2  
3 /s/ Jeffrey M. Ratinoff

4 By: Karineh Khachatourian  
5 Bryan J. Sinclair  
6 Jeffrey M. Ratinoff

7 Attorneys for Plaintiff,  
8 KNOLL, INC.

9 *OF COUNSEL*

10 GEORGE GOTTLIEB (ADMITTED *PRO HAC VICE*)

11 Email: ggottlieb@grr.com

12 MARC P. MISTHAL (ADMITTED *PRO HAC VICE*)

13 Email: mmisthal@grr.com

14 GOTTLIEB RACKMAN & REISMAN, P.C.

15 270 Madison Avenue

16 New York, NY 10016-0601

17 Telephone: (212) 684-3900

18 Facsimile: (212) 684-3999

19 Attorneys for Defendant and Counterclaimant,  
20 KNOLL, INC.